



Mary A. Gade, Director

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OPTIONAL FORM 99 (7-90)

TRANSMITTAL

February 23, 1996

Ms. Colleen Reilly Fort Sheridan BRAC Office, Bldg. 48G c/o Sheridan Reserve Center Building 475 Fort Sheridan, IL 60037

Re:

Comments addendum on the Focused Feasibility Study for Landfills 6 and 7; from the Illinois EPA's Bureau of Air

0970555001/Lake 'Fort Sheridan (BRAC) Superfund/Technical

Dear Ms. Reilly:

On February 9, 1996 the Illinois Environmental Protection Agency (Agency) scnt you comments on the Fort Sheridan Landfills 6 and 7 Interim Measures Draft Focused Feusibility Study. The Agency's Bureau of Air did not provide their comments prior to the February 9th letter and are enclosed. As with the February 9th comments, please incorporate these Bureau of Air comments into the Focused Feasibility Study or provide a written retort.

Should you have any questions regarding this information, do not hesitate to contact me at (217) 785-7728.

Sincercly,

State Remedial Project Manager

Federal Facilities Unit

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Owen Thompson, USEPA (HSRL-5J), with enclosure CC:

Chuck Lechner, USAEC, with enclosure

Jenny Berman Ross, US Navy - EFA Midwest, with enclosure

Bill Evers, US Army Reserve, with enclosure Chris Karem, USACE-Louisville, with enclosure

FAX NO. 2177823258



## ENVIRONMENTAL PROTECTION AGEN

Mary A. Gade, Director

MEMORANDUM P. O. Box 19506, Springfield, IL 62794-9506

DATE:

February 15, 1996

TO:

Paul Lake, BOL/DRM/RPSM/FFU

FROM:

DES Don Sutton

SUBJECT:

Focused Feasibility Study for Landfills 6 and 7

LPC #0970555001 - Lake County

Fort Sheridan

Super fund/Technical File Time Code SF06-600

This memo is in response to your memo dated December 21, 1995, regarding the BOA related requirements for the remedial alternatives for the Base Realignment and Closure (BRAC) occurring at landfills 6 and 7 at Fort Sheridan.

The alternatives presented for the remedial action of the landfills addressed in the "Draft-Focused Feasibility Study" package enclosed with your memo indicates the proposed use of an active gas collection system and the use of flare for combustion of the collected gas. These operations along with the air stripping and/or steam stripping operation would need construction and operating permits from the Bureau of Air. These operations would constitute an emission source and air pollution control equipment. Lake County is part of the Chicago ozone nonattainment area. Operations with the potential to emit VOM may be subject to the Reasonable Available Control Technology (RACT) Board rule as given in 35 Ill. Admin. Code Part 218. The VOM emissions from the operation of flare may be subject to 35 Ill. Admin. Code 218 Subpart TT. Similarly, the air stripping or the steam stripping operations may be subject to 35 Ill. Admin. Code 218 Subpart TT. In the event of non-applicability of Subpart TT, the general VOM emission standard of 35 Ill. Admin. Code 218.301 would apply.

Also, because of the non-attainment status of the area in which these landfills are located, demonstration of either non-applicability or compliance with the New Source Review (NSR) requirements of 35 Ill. Admin. Code Part 203, is also required.

The USEPA has proposed emission guidelines for organic material emissions from existing landfills (56FR24468, May 30, 1991). The proposed control measures for subject facilities is to achieve 98% destruction efficiency for VOM or to result in a VOM outlet concentration of 20PPMVD as hexane. Existing landfills will become subject to these emission guidelines upon their adoption by USEPA and the State of Illinois.

If you have any further questions, please feel free to contact Syed Rizwen of my staff at. 217/782-2113

DES:SAR:cj

cc:

Harish Desai

